

## **EXHIBIT 2**



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# Transcript of William Dickinson

**Date:** July 30, 2021

**Case:** Walker -v- Alliance Outdoor Group, Inc., et al.

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1           have been referenced in the report also. I also  
2           reference the Occupational Safety and Health  
3           Administration's standard on wire rope selection  
4           and installation criteria, 1926.1414.

5           All of those are in pretty much agreement of a  
6           standard of a factor of safety of 5, and they're in  
7           agreement with minimum strength of the wire rope  
8           that I used in my analysis.

9       Q.   Where in the --

10      A.   The ASTM standards, I don't think they have a  
11           factor of safety listed into them. They talk about  
12           the strength of the wire ropes and stuff, and I  
13           think they talk about the criteria for  
14           specifications for wire rope. They talk about how  
15           wire rope should be inspected. How it should be  
16           utilized. But I don't think that they use the  
17           words design factor or factor of safety in there.

18      Q.   Now, the two other references that you gave was one  
19           from OSHA, Occupational Safety and Health  
20           Administration, right?

21      A.   Correct.

22      Q.   And that is an act that's adopted by individual

1 states; is that right?

2 A. Yeah. There is Indiana OSHA and other states,  
3 yeah.

4 Q. And OSHA is applicable to workplace injuries --

5 A. Correct.

6 Q. -- not hunting products, right?

7 A. It is not, but it still establishes the industry  
8 standard.

9 Q. In fact, the OSHA regulations do not in any way,  
10 shape, or form reference treestands?

11 A. Not that I'm aware of.

12 Q. They've never used the word treestand, as far as  
13 you know, right?

14 A. As far as I know. They do work at height and they  
15 are concerned with heights. They have safety  
16 protocol for harnesses and things that are very  
17 similar to what's used in treestands. In fact, I  
18 think the original treestand harnesses that were  
19 designed were mimics of what was being used in OSHA  
20 and on industrial construction sites.

21 Q. In fact, OSHA specifically accepts, from its  
22 application, activities that aren't involved in the

1 workplace. You're aware of that, right?

2 A. Say that again.

3 Q. It accepts, from its application -- in other words,  
4 the scope of OSHA accepts, from its application,  
5 any things that aren't included in the workplace,  
6 right?

7 A. It is written to provide safe workplaces. It's not  
8 specifically applicable to treestands or  
9 recreational, but it does establish or help  
10 establish the industrial standards.

11 Q. Well, you're aware that OSHA was never referenced  
12 by the TMS in any of its standards?

13 A. It was not.

14 Q. It was never referenced by ASTM in any of its  
15 treestands?

16 A. It was not.

17 Q. You also talk about the Machinery Handbook when you  
18 talk about factors of safety used in the Machinery  
19 Handbook?

20 A. Yes.

21 Q. And you indicate that the Machinery Handbook  
22 suggests that the factor of safety should be 5.

1 A. Yes.

2 Q. Now, the Machinery Handbook itself also does not  
3 state that it implies in any way, shape, or form to  
4 treestands.

5 A. No. It applies to design. And, in fact, sections  
6 I'm referring to apply to wire rope design. The  
7 treestand, one of the main components of this  
8 treestand is wire rope design. And a designer  
9 trying to design a safe product can't live in a  
10 vacuum and say, well, as long as I meet the  
11 standard, no matter what I'm using in here, no  
12 matter how susceptible it is to corrosion, no  
13 matter how much bending and other things affect it,  
14 as long as I can meet the standard, I've produced a  
15 safe product.

16 They have to do their homework. They have to  
17 do their design. And these are standards, these  
18 are books, references that engineers use in the  
19 design of products, and that an engineer uses to  
20 design a safe product to make sure their product is  
21 not going to fail.

22 Q. You're not suggesting, sir, are you, that ASTM